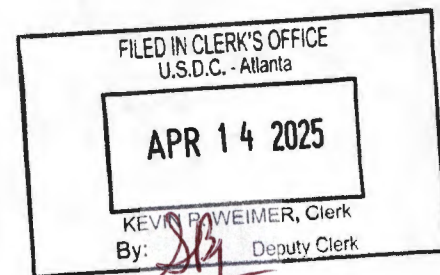


IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION



NATALIE SOTO,
Plaintiff,

v.

WENDELL HOLMES, JR.,
Defendant.

Civil Action File No.: 1:24-cv-02911-SDG

DEFENDANT'S RESPONSE IN OPPOSITION TO PLAINTIFF'S
MOTION FOR SUMMARY JUDGMENT, STATEMENT OF MATERIAL
FACTS IN DISPUTE, DECLARATION OF WENDELL HOLMES, JR.,
AND MOTION TO STRIKE PLAINTIFF'S EVIDENCE

CERTIFICATE OF SERVICE

I hereby certify that I have this day filed the foregoing DEFENDANT'S RESPONSE IN OPPOSITION TO PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT, STATEMENT OF MATERIAL FACTS IN DISPUTE, DECLARATION OF WENDELL HOLMES, JR., AND MOTION TO STRIKE PLAINTIFF'S EVIDENCE with the Clerk of Court using the CM/ECF system, and have served a true and correct copy by email to Plaintiff's counsel of

record:

Joseph W. Weeks

McNally Weeks

125 Clairemont Avenue, Suite 450

Decatur, GA 30030-2560

Email: jweeks@mcnallyweeks.com

This 14 day of April, 2025.

Respectfully submitted,



Wendell Holmes, Jr.

Pro Se Defendant

5934 Rosie Ln SE

Mableton, GA 30126

Wendellholmesjr@gmail.com

404-664-2943

JS 44 (Rev. 10/20) CIVIL COVER SHEET

I. (a) PLAINTIFFS AND DEFENDANTS

Plaintiff: Natalie Soto

Defendant: Wendell Holmes, Jr.

County of Residence of First Listed Plaintiff: Floyd County, GA

County of Residence of First Listed Defendant: Cobb County, GA

(b) Attorneys (Firm Name, Address, and Telephone Number):

Plaintiff's Attorney: Joseph W. Weeks, McNally Weeks, 125 Clairemont Ave., Ste. 450, Decatur, GA 30030 (404)-373-3131

Defendant's Attorney: Pro Se (Wendell Holmes, Jr.)

II. BASIS OF JURISDICTION

☐ 1 U.S. Government Plaintiff

☐ 2 U.S. Government Defendant

☒ 3 Federal Question (U.S. law involved)

☐ 4 Diversity (Citizens of different states)

III. CITIZENSHIP OF PRINCIPAL PARTIES

(For Diversity Cases Only)

Plaintiff: ☐ 1 Citizen of This State ☒ 2 Citizen of Another State

Defendant: ☒ 1 Citizen of This State ☐ 2 Citizen of Another State

Note: Check boxes only for diversity cases.

IV. NATURE OF SUIT

☒ 440 Other Civil Rights

☐ 890 Other Statutory Actions

V. ORIGIN

☒ 1 Original Proceeding

☐ 2 Removed from State Court

☐ 3 Remanded from Appellate Court

☐ 4 Reinstated or Reopened

☐ 5 Transferred from Another District

☐ 6 Multidistrict Litigation

☐ 8 Multidistrict Litigation – Direct File

VI. CAUSE OF ACTION

Brief Description:

Defendant files this Response and Counterclaim in opposition to Plaintiff's claims under 15 U.S.C. § 6851, alleging defamation, invasion of privacy, and harassment. Defendant disputes the core allegations and denies any unlawful conduct. Defendant seeks monetary relief for reputational damage, emotional distress, and financial loss resulting from Plaintiff's actions and public accusations.

VII. REQUESTED IN COMPLAINT

☒ Yes (seeking monetary damages)

☐ No

☐ Class Action under Rule 23, F.R.Cv.P.

Demand: \$300,000

Jury Demand: ☒ Yes ☐ No

VIII. RELATED CASE(S), IF ANY

If previously filed, list by docket number and judge:

Docket Number: 1:24-cv-02911-SDG

Judge: Hon. Steven D. Grimberg